

Jeffrey F. Barr (NV Bar No. 7269)  
8275 South Eastern Avenue, Suite 200  
Las Vegas, NV 89123  
(702) 631-4755  
barrj@ashcraftbarr.com

Thomas R. McCarthy\* (VA Bar No. 47145)  
Gilbert C. Dickey\* (VA Bar No. 98858)  
Conor D. Woodfin\* (VA Bar No. 98937)  
1600 Wilson Boulevard, Suite 700  
Arlington, VA 22209  
(703) 243-9423  
tom@consovoymccarthy.com  
gilbert@consovoymccarthy.com  
conor@consovoymccarthy.com

Sigal Chattah (NV Bar No. 8264)  
5875 S. Rainbow Blvd #204  
Las Vegas, NV 89118  
(702) 360-6200  
sigal@thegoodlawyerlv.com

*\*Admitted pro hac vice*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

REPUBLICAN NATIONAL COMMITTEE,  
NEVADA REPUBLICAN PARTY, and SCOTT  
JOHNSTON,

Plaintiffs,

v.

FRANCISCO AGUILAR, *in his official capacity as  
Nevada Secretary of State*; LORENA PORTILLO, *in  
her official capacity as the Registrar of Voters for Clark  
County*; WILLIAM "SCOTT" HOEN, AMY  
BURGANS, STACI LINDBERG, and JIM  
HINDLE, *in their official capacities as County Clerks*,

Defendants.

No. 2:24-CV-00518

**STIPULATION AND  
PROPOSED ORDER TO  
EXTEND DEADLINE  
TO FILE DISCOVERY  
PLAN**

**FIRST REQUEST**

1 This is the first stipulation for an extension of time to file the stipulated discovery  
2 plan and scheduling order. Plaintiffs (the Republican National Committee, Nevada  
3 Republican Party, and Scott Johnston) and Defendants (Francisco Aguilar; Lorena  
4 Portillo; William “Scott” Hoen; Amy Burgans; Staci Lindberg; and Jim Hindle) stipulate  
5 as follows:

6 1. On April 15, 2024, Defendant Francisco Aguilar filed his Motion to  
7 Dismiss, Doc. 26. The other defendants joined the motion. *See* Docs. 27, 28, 30, 31, 38.

8 2. The current deadline for the parties to submit a stipulated discovery plan  
9 and scheduling order is May 30, 2024. *See* Doc. 26; LR 26-1.

10 3. Over the last several weeks, the parties have been conferring over several  
11 scheduling issues, including a possible motion to stay discovery in this case pending the  
12 Court’s resolution of the motion to dismiss.

13 4. The parties are nearing agreement on these scheduling issues, and  
14 respectfully request an additional two weeks to come to an agreement that they can  
15 present to the Court.

16 5. Therefore, the parties have agreed to set June 13, 2024, as the deadline for  
17 filing the stipulated discovery plan and scheduling order.

18 6. The parties submit this stipulation in good faith and without any intent to  
19 cause undue delay in this case.

1 Dated: May 30, 2024

Respectfully submitted,

2 /s/ Laena St-Jules

3 Laena St-Jules (Bar No. 15156)  
4 AARON D. FORD  
5 NEVADA ATTORNEY GENERAL  
6 100 North Carson Street  
7 Carson City, NV 89701  
8 lstjules@ag.nv.gov

9 *Counsel for Defendant Francisco Aguilar*

10 /s/ Benjamin R. Johnson

11 Benjamin R. Johnson (Bar No. 10632)  
12 JASON D. WOODBURY  
13 CARSON CITY DISTRICT ATTORNEY  
14 885 East Musser St., Ste. 2030  
15 Carson City, NV 89701  
16 bjohnson@carson.org

17 *Counsel for Defendant William Hoen*

18 /s/ Stephen B. Rye

19 Stephen B. Rye (Bar No. 5761)  
20 LYON COUNTY DISTRICT ATTORNEY  
21 31 S. Main St.  
22 Yerington, NV 89447  
23 srye@lyon-county.org

24 *Counsel for Defendant Staci Lindberg*

25 /s/ Katherine F. Parks

Katherine F. Parks (Bar No. 6227)  
THORNDAL ARMSTRONG, PC  
6590 S. McCarran Blvd., Ste. B  
Reno, NV 89509  
kfp@thorndal.com

*Counsel for Jim Hindle*

/s/ Sigal Chattah

Sigal Chattah (Bar No. 8264)  
CHATTAH LAW GROUP  
5875 S. Rainbow Blvd #204  
Las Vegas, NV 89118  
sigal@thegoodlawyerlv.com

Jeffrey F. Barr (Bar No. 7269)  
ASHCRAFT & BARR LLP  
8275 South Eastern Ave., Ste. 200  
Las Vegas, NV 89123  
barrj@ashcraftbarr.com

Thomas R. McCarthy\*  
Gilbert C. Dickey\*  
Conor D. Woodfin\*  
CONSOVOY MCCARTHY PLLC  
1600 Wilson Blvd., Ste. 700  
Arlington, VA 22209  
tom@consovoymccarthy.com  
gilbert@consovoymccarthy.com  
conor@consovoymccarthy.com

*Counsel for Plaintiffs*  
*\*Admitted pro hac vice*

/s/ Lisa V. Logsdon

Lisa V. Logsdon (Bar No. 11409)  
STEVEN B. WOLFSON  
CLARK COUNTY DISTRICT ATTORNEY  
500 South Grand Central Pkwy.  
5th Floor, Ste. 5075  
Las Vegas, NV 89155  
Lisa.Logsdon@ClarkCountyDA.com

*Counsel for Defendant Lorena Portillo*

1 /s/ Cynthia Gregory  
2 Cynthia Gregory (Bar No. 6576)  
3 MARK B. JACKSON  
4 DOUGLAS COUNTY DISTRICT ATTORNEY  
5 138 Buckeye Road  
6 PO Box 218  
7 Minden, Nevada 89423  
8 cgregory@douglas.nv.gov

9 *Counsel for Amy Burgans*

10 **ORDER**

11 **IT IS SO ORDERED.**

12   
13 \_\_\_\_\_  
14 Hon. Maximiliano D. Couvillier III  
15 United States Magistrate Judge

16 DATED: 6/4/2024